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17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19 CHASOM BROWN, WILLIAM BYATT,
20 JEREMY DAVIS, CHRISTOPHER
21 CASTILLO, and MONIQUE TRUJILLO,
22 individually and on behalf of all similarly
situated,

Case No. 5:20-cv-03664-LHK-SVK

23 Plaintiffs,

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF JOINT SUBMISSION
RE: DEPOSITION OF GOOGLE
OFFICER SUNDAR PICHAI**

24 v.

25 GOOGLE LLC,

26 Defendant.

27
28 Referral: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google
7 LLC’s Administrative Motion to Seal portions of a Joint Statement Re: Deposition of Google
8 Officer Sundar Pichai (“Joint Submission”). In making this request, Google has carefully considered
9 the relevant legal standard and policy considerations outlined in Civil Local Rule 79-5. Google
10 makes this request with the good faith belief that the information sought to be sealed consists of
11 Google’s confidential and proprietary information and that public disclosure could cause
12 competitive harm.

13 3. Google respectfully requests that the Court seal the redacted portions of the Joint
14 Submission.

15 4. The information requested to be sealed is Google’s confidential and proprietary
16 information regarding the financial impact of a certain technical change to Google that Google
17 maintains as confidential in the ordinary course of its business.

18 5. Such confidential and proprietary information reveals Google’s internal business and
19 financial practices associated with its advertisement business, and falls within the protected scope
20 of the Protective Order entered in this action. *See* Dkt. 61 at 1-2.

21 6. For these reasons, Google respectfully requests that the identified portions of the
22 Joint Submission be filed under seal.

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1 I declare under penalty of perjury of the laws of the United States that the foregoing is true
2 and correct. Executed in San Francisco, California on December 17, 2021.
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4 DATED: December 17, 2021

5 QUINN EMANUEL URQUHART &
6 SULLIVAN, LLP

7 By /s/ Jonathan Tse
8 Jonathan Tse

9 *Attorney for Defendant*

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